

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 1:25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida,

Defendants.

and

THE MICCOSUKEE TRIBE OF INDIANS,

Proposed Intervenors.

**DECLARATION OF CHRISTOPHER W. McVOY, Ph.D.**

1. My name is Christopher W. McVoy, Ph.D, and I make this declaration based on my personal knowledge. If called as a witness, I could and would competently testify to the facts set forth herein.

2. I am an expert in the environmental and hydrological aspects of Everglades restoration, with nearly 30 years of professional experience. I trained as a soil physicist and ecologist and I am the prime author of the book, *Landscapes and Hydrology of the Pre-Drainage Everglades* (McVoy et al. 2011), which is an authoritative treatment of the Everglades prior to drainage and development.

3. I have visited the Big Cypress National Preserve, and I am familiar with the area. Since June 22, 2025, I have visited the entrance to the Dade-Collier Training and Transition Airport (the “TNT Site”) on numerous occasions. I requested and was granted a tour of the site in the late afternoon of June 28, 2025. While I did not take photographs during this tour, seeing the construction completed to that time allowed unequivocal recognition of features seen in historic satellite imagery and oblique aerial photographs of the Site.

4. I have analyzed many oblique aerial and satellite photographs of the TNT Site, including numerous photos taken over the past few weeks by Mr. Ralph Arwood. I have analyzed recent aerial photography of the Site and historic satellite imagery and other photographs in order to evaluate the extent of new paving at the Site since June 22, 2025.

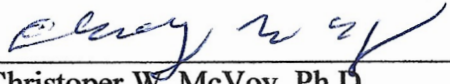
5. Based on my comparison of historical photographs of the TNT Site, against recent aerial photography, approximately 20+ acres of new pavement has been applied at the Site. This new pavement consists of an approximately 11-acre parking area, an additional approximately 7-acre tent pad, and new roads and smaller newly paved areas.

6. I have seen statements from the Deputy Director of Communications for the Florida Division of Emergency Management to the effect that all new pavement was applied over “a pre-existing cement pad [as to it] a thin layer of dirt and grass had settled.” I could find

no evidence to support this statement. Rather, in my expert opinion, new pavement has been applied in areas that had been previously cleared and mowed.

7. Attached hereto as Exhibit 1 is a report summarizing my observations based on my review of the historic satellite imagery and recent aerial photographs taken by Mr. Arwood.

I declare under penalty of perjury that the foregoing is true and correct and was executed on July 21, 2025, in Miami-Dade County, Florida.

  
\_\_\_\_\_  
Christopher W. McVoy, Ph.D.

## **Analysis of Possible Areas of New Pavement at the Dade Collier Training & Transition Airport**

Dr. Christopher McVoy

July 20, 2025

This report analyzes recent aerial photography and historical satellite imagery to address the following three questions:

- 1) Has new [asphalt] paving occurred as part of construction of a mass detention center, informally referred to as “Alligator Alcatraz,” at 54575 Tamiami Trail E, Ochopee, FL 34141, site of the Dade Collier Training & Transition Airport?
- 2) If so, where, and approximately how many acres?
- 3) If so, what underlies the new paving – (a) the original geology and soils native to the Big Cypress National Preserve; or (b) cement pads dating to the original late 1960’s construction of the TNT airport, then known as the Jetport; or (c) something else?

### **Executive Summary**

Three dates of aerial photography from July 2025, along with recent and historical satellite imagery, were examined for evidence of new asphalt paving as part of the construction of a new mass detention facility on the site of the Dade Collier Training & Transition Airport. There is clear indication that in one area approximately 11 acres of new pavement have been identified, and in another area approximately 7 acres of new pavement have been identified. Also a number of newly paved roadways and smaller newly paved areas have been identified. The total amount of new pavement is approximately 20 acres.

The possibility that the areas of new pavement had been placed on top of pre-existing areas of cement pad was also investigated. No indication of pre-existing cement pads was found. Instead, it seemed most likely that the new paving was placed on top of the original soil substrate. This soil might have been partially leveled in the late 1960’s, but sufficient substrate depth was present to grow substantial vegetation. This conclusion was supported by a linear E-W pattern, suggestive of vegetation mowing, that was visible in all historical photos.



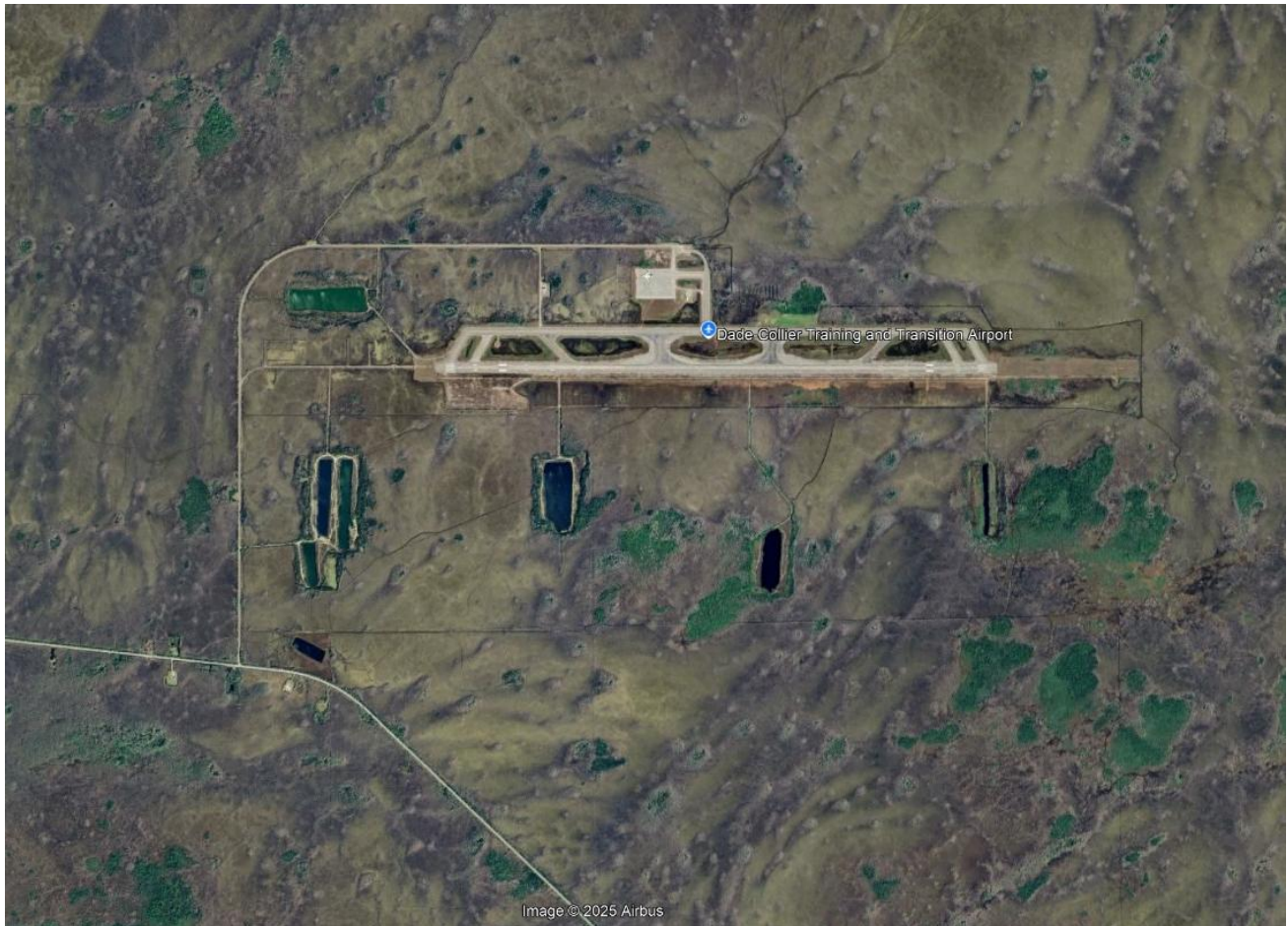


**Fig. 1.** West end of main runway of Dade Collier Training & Transition Airport, looking west on November 2, 2005. Note surface water present on the many wetlands present within the airport. Source: Ralph Arwood Photography, photo KTNT 11-02-2005 51684.



**Fig. 2.** Aerial view of Dade Collier Training & Transition Airport, looking east on July 18, 2025. Foreground is Big Cypress National Preserve, which surrounds the airport. The bright spot in foreground center is reflection of sun from surface water, present at this time throughout the area. Minute 0:10 of Video KTNT 07-18-2025 01, courtesy Ralph Arwood Photography.





**Fig. 3.** Satellite image of Dade Collier Training & Transition Airport and surrounding portion of Big Cypress National Preserve. Note texture of native wetland landscape, both within and surrounding the airport. Source: Google Earth, Feb 21, 2025 image.



**Fig. 4.** Locator diagram for areas of asserted new paving. The two large areas, Area 1 (11+ acres) and Area 2 (7+ acres) are analyzed separately; Areas 3-7 are mostly newly paved roadways and are noted but not quantified.

### Analysis of Area 1

Area 1, here referred to as the “Southwest Parking Area,” is the closest area to the entrance on Tamiami Trail (U.S. 41), being reached by the east-west road (“4” on the locator diagram in Fig. 4) where paving was already in progress on June 28, 2025. Its location near the west end of the runway as well as shapes of surrounding features make it easy to locate unambiguously. Fig. 5 shows the progression from a brown colored open area to paved area, to paved area with markings, and finally to paved area with many vehicles parked in the markings.



**Fig. 5.** Newly paved east-west road (“4” on the locator diagram in Fig. 4) is in center of this eastward looking photo and leads to Area 1. Source: Minute 0:09 of Video KTNT 07-11-2025 03, courtesy Ralph Arwood Photography.





Feb 21, 2025



July 05, 2025



July 11, 2025



July 18, 2025

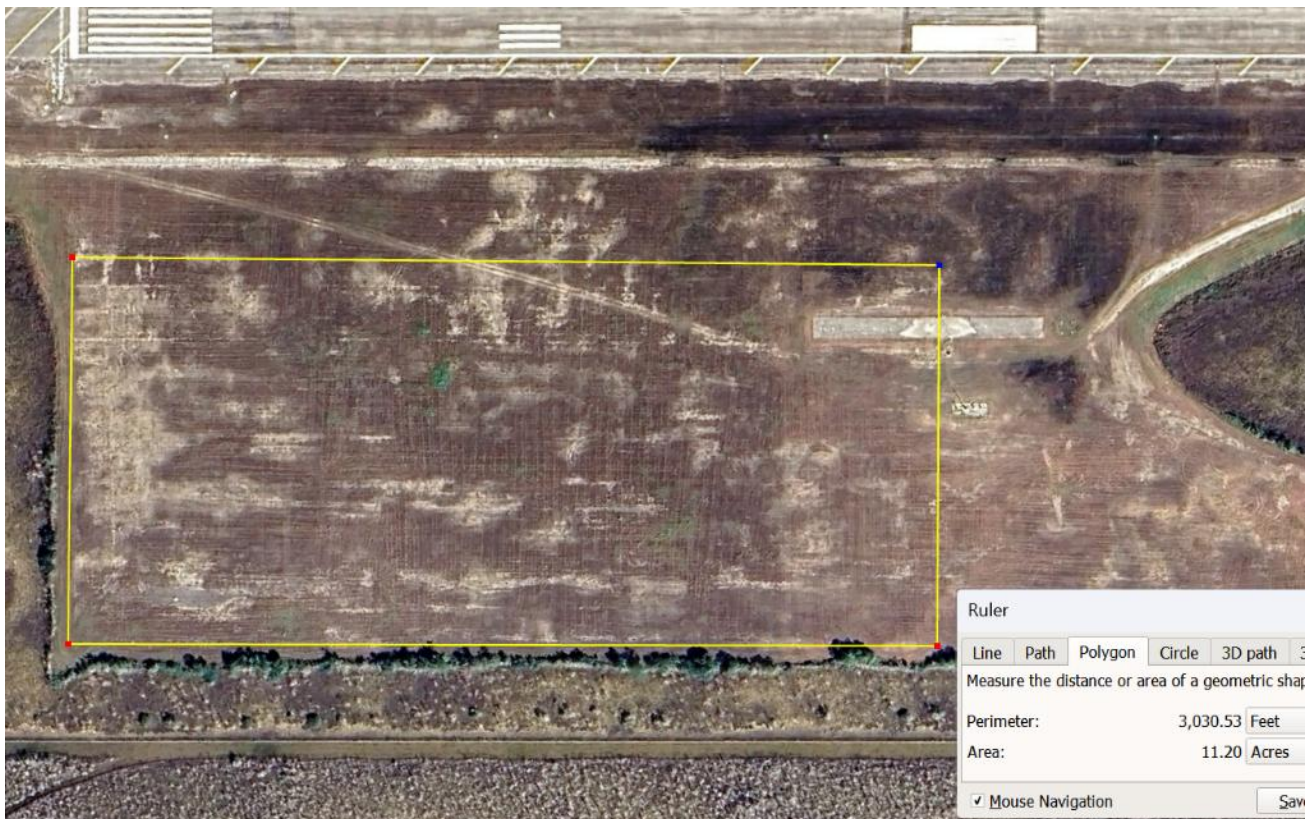
**Fig. 6.** Area 1, “Southwest Parking Area.” Time sequence of area’s appearance. Sources: Feb 21: Google Earth; Jul 05: Video KTNT 07-05-2025 03, Minute 3:40; Jul 11: Video KTNT 07-11-2025 03, Minute 0:39; Jul 18: Photo 07-18-2025 KTNT 06 25,51.721N 80,54.869W (portion). All July imagery courtesy Ralph Arwood Photography.



The spatial extent of Area 1, the “Southwest Parking Area,” was estimated by finding landmarks corresponding to the pavement edges seen in the aerial photographs, marking the same edges on Google Earth, then using the Google Earth “Ruler” tool.



**Fig. 7.** Based on the time sequence seen in Fig. 6, the dark rectangle is assumed to newly placed asphalt. Light sandy brown area to east and north of asphalt is newly scrapped (or filled) area. Red alignment lines were used to estimate extent of assumed paved area. Photo source: 07-05-2025 KTNT 23 25,51.796N 80,54.529W (portion), courtesy Ralph Arwood Photography.



**Fig. 8.** Untilted, unrotated Google Earth image used to estimate area of the paved region shown in Fig. 7. Alignment lines shown in Fig. 7 were used to locate eastern and northern boundaries; vegetation rows to estimate location of southern and western boundaries. This newly paved area is estimated to be 11+ acres.



## Analysis of Area 2

Area 2, the “Tent Expansion Area” is an expansion of a large rectangular area that was paved in the late 1960s as part of the original Jetport.



**Fig. 9.** Area 2, the “Tent Expansion Area.” Source: Photo 07-11-2025 KTNT 19 25,51.904N 80,53.699W (portion). Courtesy Ralph Arwood Photography.





Feb 21, 2025



July 05, 2025



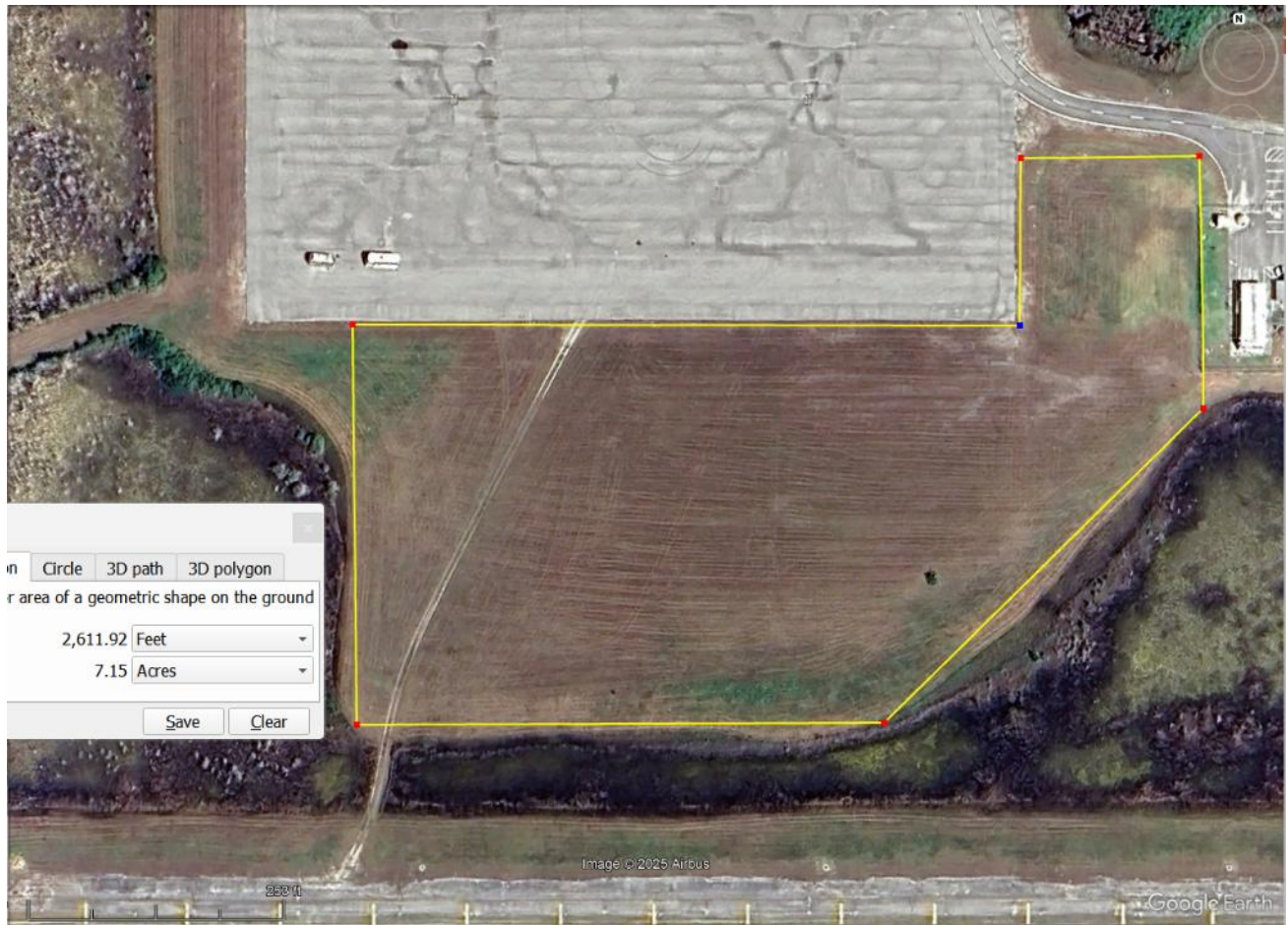
July 11, 2025



July 18, 2025

**Fig. 10.** Area 2, “Tent Expansion Area.” Time sequence of area’s appearance. Sources: Feb 21: Google Earth; Jul 05: Photo 07-05-2025 KTNT 08 25,51.938N 80,53.692W (portion); Jul 11: Photo 07-11-2025 KTNT 36 25,52.013N 80,53.704W (portion); Jul 18: Photo 07-18-2025 KTNT 26 25,52.018N 80,53.752W (portion). All July imagery courtesy Ralph Arwood Photography.

The spatial extent of Area 2, the “Tent Expansion Area,” was estimated by finding landmarks corresponding to the pavement edges seen in the aerial photographs, marking the same edges on Google Earth, then using the Google Earth “Ruler” tool.



**Fig. 11.** Untilted, unrotated Google Earth image used to estimate extent of paved Area 2. This newly paved area is estimated to be 7+ acres.



### Smaller Paved Areas

(Areas 3-7)



**Fig. 12.** Locator diagram for Areas 3-7, which are mostly newly paved roadways and are noted here but were not not quantified.



Area 3



Area 4 (west)



Area 4 (east)





Area 5



Area 6



Area 7

**Fig. 13.** Smaller areas of new paving.

### **Assertion of Pre-Existing Cement Pad Underlying Newly Asphalted Area(s)**

It has been asserted that the paving of Area 1 would have minimal environmental impact because the asphalt was placed on top of a pre-existing cement pad that had been constructed in the late 1960's as part of the original Jetport. Additionally, it was implied that the cement pad was not currently visible due to accumulation of soil and vegetation on top of the reputed cement pad. For example, Stephanie Hartman, Deputy Director of Communications at the Florida Division of Emergency Management asserted in a July 7, 2025 email that, "The area referenced consisted of a preexisting cement pad that was installed more than 50 years ago. Over time, a thin layer of dirt and grass had settled on top."

I can find no evidence to support the statement by Ms. Stephanie Hartman indicating a pre-existing cement pad. Instead, all the historical imagery I found suggests that the area was cleared of vegetation, and perhaps also leveled, probably at the same time that the runway was constructed (ca. 1968-70). Patterns in the historical imagery suggest systematic traversing of the area by equipment, likely by large mowers or brush hogs. A "thin layer of dirt and grass" on top of a cement pad would be unlikely to need mowing and would be very unlikely to produce the patterns seen. Additionally, the high rainfall intensity of South Florida thunderstorms would likely prevent the accumulation of anything more than a few millimeters of unconsolidated sediments on a cement pad. A layer that thin would not support sufficient growth to require mowing.

Examination of multiple years of historical imagery suggests that the newly asphalted areas (Areas 1 and 2) most likely were areas of original soil, cleared of brush and trees around 1970, and subsequently kept to low vegetation by periodic mowing. While there might well have been an original intent to cover with a cement pad, there is no indication that such a pad was ever installed.

The following figures identify the location in question, show multiple years of historical satellite images, and an oblique aerial photograph from 1970, taken during the time of initial construction.

Similar mowing patterns are visible for Area 2, the "Tent Expansion Area" (location: Fig. 4) in historical satellite imagery. Figs. 18 and 19 show two examples.



**Fig. 14.** Area 1, the “Southwest Parking Area.” Satellite image from Feb 21, 2025 (prior to any detention center construction). Note the N-S and E-W patterning, which is likely from equipment such as mowers or brush hogs criss-crossing this area. Vegetation that needed mowing would not grow on top of cement. The red oval identifies an actual, very small cement pad.



**Fig. 15.** Area 1, the “Southwest Parking Area,” seen in an oblique aerial photo, looking WSW. The red oval indicates an actual, very small cement pad, seen also in the satellite imagery (Fig. 14).

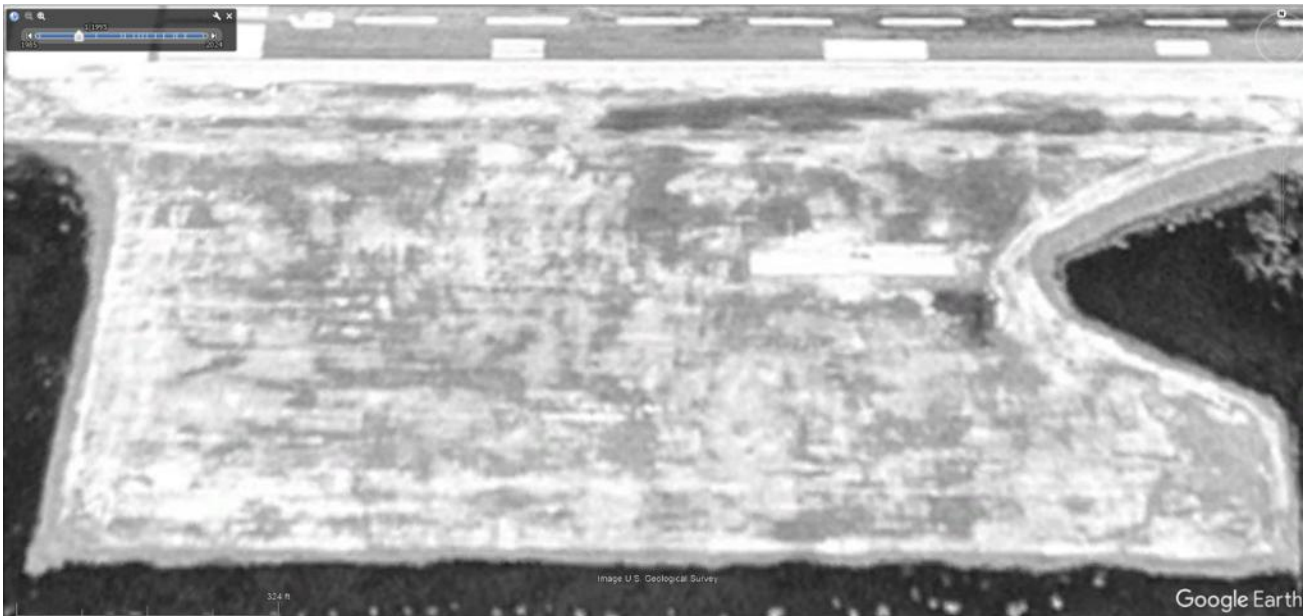




**Fig. 16.** Area 1, the “Southwest Parking Area.” Satellite image from 2014. Note the E-W patterning, which is likely from mowing equipment. Vegetation that needed mowing would not grow on top of cement.



**Fig. 16.** Area 1, the “Southwest Parking Area.” Satellite image from 2009. Note the E-W patterning, which is likely from mowing equipment. Vegetation that needed mowing would not grow on top of cement.



**Fig. 16.** Area 1, the “Southwest Parking Area.” Satellite image from 1995. Even in this low resolution image, an indication of the E-W patterning, likely from mowing, is apparent.



**Fig. 17.** “1970 - aerial view of the Dade County Training & Transition Airport under construction.” Red oval is indicates the location of Area 1. There is no indication that Area 1 was a cement pad in 1970, the year construction was halted. Source: <https://pbase.com/donboyd/image/165484225>





**Fig. 18.** Area 2, the “Tent Expansion Area.” Satellite image from 2024. Note the mostly E-W patterning, which is likely from mowing equipment. Source: Google Earth.



**Fig. 19.** Area 2, the “Tent Expansion Area.” Satellite image from 2010. Mowing pattern is particularly visible in this year. Source: Google Earth.